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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No.: 2:21-cr-00185-JAD-DJA
vs.)	
)	STIPULATION TO CONTINUE
DJEKEM KEDOSHIM,)	SENTENCING DATE
)	
)	(FIRST REQUEST)
Defendant.)	
)	

Certification: This stipulation is filed pursuant to General Order 2007-04.

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou Acting United States Attorney, and Daniel Schiess, Assistant United States Attorney, counsel for the United States of America, and Gabriel L. Grasso, Esq, counsel for DJEKEM KEDOSHIM (KEDOSHIM), that the sentencing hearing currently scheduled for May 5, 2022, at 11:00 a.m., be vacated and continued to a date and time convenient to this court, but no event earlier than THIRTY (30) days.

Pursuant to General Order No. 2007-04, this stipulation is entered and based upon the following:

1. KEDOSHIM is on pretrial release and does not oppose this continuance.
2. The parties agree to the continuance.
3. The additional time requested herein is not sought for purposes of delay, but to allow for the parties to carry out certain actions contemplated under the plea agreement.
4. Additionally, defense counsel has a scheduled medical procedure on May 4, 2022, and may not be able to attend court on the May 5th Sentencing date.

- 1 5. Denial of this request for continuance would deny the defense sufficient time to be
2 able to assist in defendant's sentencing and file a Sentencing Memorandum with the court.
3 6. This is the first request for a continuance of the sentencing date in this case.

4 DATED this 20th day of April, 2022.

5 RESPECTFULLY SUBMITTED BY:
6

7 /s/ Daniel Schiess
8 DANIEL SCHIESS
9 Assistant United States Attorney

/s/ Gabriel L. Grasso
GABRIEL L. GRASSO
Attorney for KEDOSHIM

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UNITED STATES OF AMERICA,)

Plaintiff,)

vs.)

DJEKEM KEDOSHIM,)

Defendant.)

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STIPULATION TO CONTINUE
SENTENCING DATE

(FIRST REQUEST)

FINDINGS OF FACT

Based upon the submitted Stipulation, and good cause appearing therefore, the Court finds that:

1. The additional time requested herein is sought to allow for the parties to carry out certain actions contemplated under the plea agreement. Moreover, defense counsel will require the additional time requested to be able to attend the sentencing hearing.
2. KEDOSHIM is on pretrial release and does not oppose the continuance.
3. The parties agree to the continuance.

CONCLUSIONS OF LAW

Denial of this request for continuance would result in a miscarriage of justice.

ORDER

IT IS ORDERED that the sentencing hearing currently scheduled for MAY 5, 2022, at 11:00 a.m., be vacated and continued to June 14, 2022, at 11:00 a.m.

IT IS SO ORDERED:


UNITED STATES JUDGE

DATED: 4/21/2022